

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

RIHANNA SHAHROHKIMANESH,
Individually and on behalf of all others similarly
situated,

Plaintiff,

v.

HARBORSIDE INC., PETER BILODEAU,
ANDREW BERMAN, KEITH LI, ADAM
SZWERAS, and MATTHEW HAWKINS,

Defendants.

Civil action No. 3:20-cv-01551-MO

**AGREED STIPULATION AND
MOTION FOR
ENTRY OF AGREED ORDER
REGARDING SERVICE AND FILINGS**

WHEREAS, on September 8, 2020, Plaintiff filed this Class Action Complaint (the “Complaint”);

WHEREAS, on October 13, 2020, Plaintiff effected service of the Complaint and Summons upon Defendant Harborside, Inc. (“Harborside”);

WHEREAS, upon the terms set forth in this Agreed Stipulation and Motion for Entry of Agreed Order Regarding Service and Filings, counsel for Harborside has agreed to confirm service of the Complaint without waiving any of its rights and defenses other than with respect to sufficiency of service of process;

WHEREAS, because this action asserts claims under the Securities Exchange Act of 1934, 15 U.S.C. § 78a *et seq.*, it is subject to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”);

WHEREAS, the PSLRA provides for, among other things, appointment of a lead plaintiff, 15 U.S.C. § 77u-4(a)(3);

WHEREAS, the deadline for filing lead plaintiff motions is November 9, 2020, *see id.* § 77u-4(a)(3)(A)(i)(II);

WHEREAS, the undersigned counsel have conferred and agreed that the time for Harborside to answer, move to dismiss, or otherwise respond to the Complaint shall be stayed until after the Court appoints a lead plaintiff.

NOW, THEREFORE, by and through their undersigned counsel, Plaintiff and Harborside hereby stipulate, agree, and move for the Court to enter an Agreed Order as follows:

1. Harborside confirms service of the Complaint without waiving any of its rights or defenses other than with respect to the sufficiency of service of process.

2. Harborside's deadline to answer, move to dismiss, or otherwise respond to the Complaint is stayed pending the appointment of a lead plaintiff.

3. Within fourteen (14) days after the entry of an order appointing a lead plaintiff and lead counsel in this action, the lead plaintiff and Harborside shall meet and confer and propose a schedule to the Court for the filing of an amended complaint and the response thereto.

4. The parties agree to the entry of the attached proposed Agreed Order.

5. Counsel for Plaintiff and Harborside agree that this Agreed Stipulation is made in full reservation of and without waiver or prejudice of any rights, claims, objections (with the exception of objecting to improper service of process), defenses, arguments, and motions in relation to the Complaint (or any subsequently filed complaint), whether procedural, substantive or otherwise, that any party may otherwise have.

* * *

Plaintiff and Harborside respectfully request that the Court enter the [Proposed] Agreed Order attached hereto as **EXHIBIT 1**.

AGREED as to form and content on this 30th day of October, 2020:

/s/ Jeffrey S. Ratliff

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EXHIBIT 1

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AGREED ORDER

Based on the foregoing stipulation of the parties, **IT IS HEREBY ORDERED** that the time for Harborside, Inc. (“Harborside”) to respond to the operative complaint with such pleadings, motions, or objections as Harborside deems appropriate shall be stayed until the Court has appointed a lead plaintiff under the provisions of the Private Securities Litigation Reform Act (“PSLRA”). Within fourteen (14) days after the entry of order appointing a lead plaintiff and lead counsel in this action, the lead plaintiff and Harborside shall meet and confer and propose a schedule to the Court for the filing of an amended complaint and the response thereto.

SO ORDERED this _____ day of _____, 2020.

United States District Court Judge